

Exhibit 3(A) to the Joint Status Report:
Defendant Jane Starrett's Initial Disclosure of Witnesses

Based on the information reasonably available to Defendant Jane Starrett ("Defendant") at the present time, Defendant identifies the following individuals as likely to have discoverable information that Defendant may use to support her defenses, other than solely for impeachment. In addition, Defendant reserves the right to use one or more of the witnesses identified in Plaintiff's initial disclosures to support Defendant's claims and defenses, other than solely for impeachment.

Name	Last Known Address & Phone Number	Subject(s) of Information
<i>Thornburg Mortgage, Inc.</i>		
Ahn, Ralph	Unknown	Financing of Thornburg's Investment Activities, Reverse Repurchase Agreements, Margin Call Activity, Communications with Thornburg's Lenders, Efforts to Raise Capital, Liquidity, and Cash
Anderson, Anne-Drue M.	223 No. Guadalupe Box 510 Santa Fe, NM 87501	Thornburg's Financial Condition in Feb. 2008
Ang, Robert	Unknown	Thornburg's Liquidity, Going Concern, and Margin Call Activity
Ater, David	941 Calle Mejia Apt 710 Santa Fe, NM 87501 Tel: (505) 988-1919	Thornburg's Financial Condition in Feb. 2008

Name	Last Known Address & Phone Number	Subject(s) of Information
Badal, Joseph H.	Bank Lending Solutions 3 Prado Vista Sandia Park, New Mexico 87047 Tel: (505) 690-4503	Preparation of Thornburg's 2007 Form 10-K and Disclosures
Beckett, Anne E.	309 Loma Arisco Santa Fe, NM 87501-1269 Tel: (505) 466-3460	Preparation of Thornburg's 2007 Form 10-K and Disclosures
Benavidez, Devona	Morgan Stanley 6701 Uptown Blvd. NE Albuquerque, NM 87110 Tel: (505) 889-2890	Thornburg's Efforts to Raise Capital, Cash and Liquidity, and to Satisfy Margin Calls
Buniel, Shawn	211 W Water St Santa Fe, NM 87501-6212 Tel: (505) 983-1824	Thornburg's Going Concern Analysis, FAS 115 Impairment Analysis
Burke, Dwight	Unknown	Financing of Thornburg's Investment Activities, Reverse Repurchase Agreements, Margin Call Activity
Burns, Deborah	2596 Tano Compound Drive Santa Fe, NM 87506	Preparation of Thornburg's 2007 Form 10-K and Disclosures
Campbell, Craig (FBR & Co.)	FBR & Co. 18101 Von Karman Avenue Suite 950 Irvine, CA 92612 949.477.3100 Main 800.952.7521 Toll Free	Thornburg's Efforts to Raise Capital, Cash and Liquidity; Disclosures in Thornburg's 2007 Form 10-K

Name	Last Known Address & Phone Number	Subject(s) of Information
Coltharp, Michael	4309 Jaguar Loop Santa Fe, NM 87507 (720) 350-9793	Preparation of Thornburg's 2007 Form 10-K and Disclosures, Loan Delinquency Rates, Future Loan Losses, FAS 115 Impairment Analysis
Cutler, Eliot R.	Akin Gump 1333 New Hampshire Avenue, N.W. Washington, DC 20036-1564 Tel: (202) 887-4240	Thornburg's Financial Condition in Feb. 2008
DeCoff, Paul G.	3 Picacho Peak Dr Santa Fe, NM 87506-8290 Tel: (505) 982-6219	Preparation of Thornburg's 2007 Form 10-K and Disclosures
Dowell, John	Thornburg Investment Management 2300 North Ridgetop Road Santa Fe, NM 87506 Tel: (800) 847-0200	Thornburg's Efforts to Raise Capital, Cash and Liquidity and to Satisfy Margin Calls; Thornburg's Lending Practices
Feldman, Patrick	Unknown	Financing of Thornburg's Investment Activities, Reverse Repurchase Agreements, Margin Call Activity, Efforts to Raise Capital, Cash, Liquidity
Fellers, Nathan	Sandia National Laboratories 1515 Eubank SE Albuquerque, NM 87123 Tel: (505) 284-9254	Financing of Thornburg's Investment Activities, Reverse Repurchase Agreements, Margin Call Activity, Efforts to Raise Capital, Cash, Liquidity
Gage, Deborah	Unknown	Thornburg's Liquidity, Margin Call Activity
Gitana, Nyira	Unknown	Thornburg's Financial Condition in Feb. 2008 Market Reaction to 2007 Form 10-K

Name	Last Known Address & Phone Number	Subject(s) of Information
Goldstone, Larry A.	8 Santo Domingo Circle Santa Fe, New Mexico 87506 Work: (505) 629-4301	Reverse Repurchase Agreement Obligations, Margin Call Payment Plans, I/O Strip Transfers, FAS 115 Impairment Analysis, 3/08 Securitization and Equity Capital Raise
Gonzalez, Sam	OneWest Bank 888 E. Walnut St. Pasadena, CA 91101 Tel: (626) 535-5754	Thornburg's Efforts to Raise Capital, Cash and Liquidity
Gordon, Blake	Unknown	Market reactions to Thornburg's 2007 Form 10-K
Jacquez, Francine	1494 Clark Rd Santa Fe, NM 87507-5173 Tel: (505) 438-6612	Preparation of 2007 Form 10-K and Disclosures
Jeffers, Michael B.	Unknown	Thornburg's Financial Condition in Feb. 2008
Jensen, Brian	Unknown	Market Reaction to 2007 Form 10-K
Kalangis, Ike	1714 San Cristobal Rd SW Albuquerque, NM 87104-1131 Tel (505) 224-9414	Thornburg's Financial Condition in Feb. 2008
Lopez, Owen M.	812 Don Gaspar Ave Santa Fe, NM 87505-2632 Tel: (505) 983-2472	Thornburg's Financial Condition in Feb. 2008
Mullin III, Francis I.	3510 Turtle Creek Blvd., Unit 10-D Dallas, TX 75219	Thornburg's Financial Condition in Feb. 2008
Oguz, Ali	Unknown	Thornburg's Efforts to Raise Capital, Cash and Liquidity
O'Leary Lopez, Suzanne	Unknown	Market Reaction to Thornburg's 2007 Form 10-K

Name	Last Known Address & Phone Number	Subject(s) of Information
Pell, Amy	2862 Puebla Jacona Santa Fe, New Mexico 87507	Disclosures in Thornburg's 2007 Form 10-K, Thornburg's Going Concern Analysis; FAS 115 Impairment Analysis; Thornburg's 2007 Form 10-K, 10-K/A and 8-Ks; Market Reaction to Thornburg's 2007 Form 10-K
Peng, Meijing	Unknown	Financing of Thornburg's Investment Activities, Reverse Repurchase Agreements, Margin Call Activity
Petrush, Daniel	Thornburg Investment Management 2300 North Ridgetop Road Santa Fe, NM 87506 Tel: (800) 847-0200	Thornburg's Going Concern Analysis, Thornburg's Margin Call Activity
Plasters, Mark	Harland Clarke 10931 Laureate Drive San Antonio, TX 78249 Tel: (210) 697-8888	Thornburg's Financial Condition in Feb. 2008
Rhoades, Kyle	2190 Bay St, Apt 103 San Francisco, CA 94123-1940	Financing of Thornburg's Investment Activities, Reverse Repurchase Agreements, Margin Call Activity, Efforts to Raise Capital, Cash, Liquidity
Segell, Kerri	38 Alondra Rd Santa Fe, NM 87508-8316 Tel: (505) 466-2749	Market Reaction to 2007 Form 10-K
Sherman, Stuart C.	4438 Avenida Del Sol NE Albuquerque, NM 87110-6179 Tel: (505) 262-0415	Thornburg's Financial Condition in Feb. 2008
Shiozaki, Caren	Unknown	Preparation of Thornburg's 2007 10-K and Disclosures

Name	Last Known Address & Phone Number	Subject(s) of Information
Simmons III, Clarence G.	254 Tano Road Santa Fe, New Mexico 87501 Work: (505) 629-4302	Reverse Repurchase Agreement Obligations, Margin Call Payment Plans, I/O Strip Transfers, Efforts to Raise Capital, Liquidity, and Cash, Thornburg's Going Concern Analysis and FAS 115 Impairment Analysis
Smiley, Ben	Unknown	Thornburg's Going Concern Analysis
Stanhope, Xen	188 Calle Galisteo Santa Fe, NM 87508-1505 Tel: (505) 474-5385	Financing of Thornburg's Investment Activities, Reverse Repurchase Agreements, Margin Call Activity, Efforts to Raise Capital, Cash, Liquidity
Starrett, Jane	500 Johnson Lane Santa Fe, NM 87505 Tel: (505) 920-4280	Thornburg's 2007 Financial Statements and March 2008 Restatement, OTTI Analysis, Margin Call Activity
Sturdy, Tim	Financial Counselors, Inc. FCI Trust Investment Solutions 442 West 47th Street Kansas City, MO 64112 Tel: (816) 329-1587	Financing of Thornburg's Investment Activities, Reverse Repurchase Agreements, Margin Call Activity, Efforts to Raise Capital, Cash, Liquidity, KPMG 2007 Audit
Thornburg, Garrett	Thornburg Investment Management 2300 North Ridgetop Road, Santa Fe, NM 87506 Tel: (800) 847-0200	Thornburg's Financial Condition in Feb. 2008
Timmons, Sandy	Unknown	Thornburg's Efforts to Raise Capital, Cash and Liquidity
Yates, Allison	2405 Camino Capitan Santa Fe, NM 87505-6466	Market Reaction to 2007 Form 10-K
KPMG LLP		

Name	Last Known Address & Phone Number	Subject(s) of Information
Acree, Dan	KPMG LLP 6565 Americas Pkwy NE # 700 Albuquerque, NM 87110 Tel: (505) 872-3210	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Baucom, Tara	KPMG LLP 303 E Wacker Dr # 1600 Chicago, IL 60601 Tel: (312) 665-1000	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Browning, Jim	RigNet, Inc. 1880 S. Dairy Ashford Suite 300 Houston, TX 77077-4760 Tel: (281) 674-0100	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Crawford, Craig	KPMG LLP 345 Park Avenue New York, NY 10154 Tel: (212) 758 9700	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
DiSarro, Fran	KPMG LLP 757 Third Avenue, 11th Floor New York, NY 10017 Tel: (212) 909-5400	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Foley, Michael	Unknown	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation

Name	Last Known Address & Phone Number	Subject(s) of Information
Glass, David	KPMG LLP 717 North Harwood St # 3100 Dallas, TX 75201 Tel: (214) 200-7000	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Hall, Jennifer L.	KPMG LLP 6565 Americas Pkwy NE # 700 Albuquerque, NM 87110 Tel: (505) 884-3939	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Jones, Meg	Unknown	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Leva, Larry	KPMG LLP 757 Third Avenue, 11th Floor New York, NY 10017 Tel: (212) 872-5589	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
McLamb, Robert P.	KPMG LLP 811 Main Street Houston, TX 77002 Tel: (713) 319-2000	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Plumber, Matt	Unknown	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation

Name	Last Known Address & Phone Number	Subject(s) of Information
Ranzilla, Sam	KPMG 345 Park Avenue New York, NY 10154 Tel: (212) 758-9700	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Reinhart, Cynthia C.	KPMG LLP 6565 Americas Pkwy NE # 700 Albuquerque, NM 87110 Tel: (505) 884-3939	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Smith, Michael	KPMG LLP 717 North Harwood St # 3100 Dallas, TX 75201 Tel: (214) 200-7000	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Stoliar, Tina	KPMG LLP 20 Pacifica # 700 Irvine, CA 92618 Tel: (949) 885-5400	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Taylor, John	Unknown	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
Wagner, David	KPMG LLP 757 Third Avenue, 11th Floor New York, NY 10017 Tel: (212) 909-5400	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation

Name	Last Known Address & Phone Number	Subject(s) of Information
Womack, Clyde	Bible Teaching Resources 100 Independence Place Ste 213 Tyler, TX 75703 Tel: (903) 939-1201	Audit of Thornburg's 2007 Financial Statements, Thornburg's 2007 Form 10-K and 2008 Restatement, Going Concern and OTTI Analyses, "Subsequent Events" Evaluation
<i>REPO Lenders & Third Parties</i>		
Acevedo, Kevin Duffy (Natixis)	Unknown	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K
Benett, Halle (UBS)	UBS Capital LLC 299 Park Avenue New York, NY 10171 Tel: (212) 821-3000	Disclosures in Thornburg's Form 10-K
Buchanan, Wayne (Bear Stearns)	Cantor Fitzgerald 110 E. 59th St. New York, NY 10022 Tel: (212) 938-5000	Margin Call Activity; Reverse Repurchase Agreements; Thornburg's Efforts to Raise Capital, Cash and Liquidity, and to Satisfy Margin Calls; Market Reactions to Thornburg's 2007 Form 10-K
Carey, Timothy (ING)	ING Financial Markets LLC 1325 Avenue of The Americas New York, NY 10019 Tel: (646) 424-6000	Market Reaction to 2007 Form 10-K,
Cisz, Mark M. (JP Morgan)	JPMorgan Chase & Co. 270 Park Ave New York, NY 10017-2014	Reverse Repurchase Agreement with JP Morgan, Margin Calls, 2/28/08 Default Notice (JP Morgan Executive Director)
Cofsky, Larry (UBS)	UBS 299 Park Avenue New York, NY 10171 Tel: (212) 821-3000	Reverse Repurchase Agreement with UBS, UBS Margin Call Activity in February 2008

Name	Last Known Address & Phone Number	Subject(s) of Information
Diekman, Steve (Lehman Brothers)	Barclays 555 California Street San Francisco, CA 94104 (415) 263-3300	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K
Duffy, John Michael (Deutsche Bank Securities)	Unknown	Market Reaction to 2007 Form 10-K
Fee, Brian (UBS)	Unknown	Reverse Repurchase Agreement with UBS, Margin Call Activity, UBS Default Notice
Hales, Shannon J. (Citigroup)	388 Greenwich Street New York, NY 10013 Tel: 212-531-4546	Reverse Repurchase Agreement with Citigroup, Margin Calls, 2/21/08 Reservation of Rights Letter from Citigroup
Harris, Brian (Moody's)	Unknown	Market Reaction to August 2007 Margin Calls
Heald, Russell (Greenwich Capital)	Unknown	Market Reaction to 2007 Form 10-K
Jones, Spencer (Barclays)	Unknown	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K
Kim, Judy (Greenwich)	MSCI Barra 50 Fremont Street Suite 2430 San Francisco, CA 94105	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K
Litvak, Jesse (RBS Greenwich Capital)	Unknown	Market Reaction to 2007 Form 10-K
MacIntosh, Charles (Merrill Lynch Trader)	Unknown	European Hedge Fund Collapse, Market Reaction to 2007 Form 10-K
Malekian, Stephen G. (Citigroup)	Citigroup 390 Greenwich Street New York, NY 10013 Tel: (212) 723-6000	Reverse Repurchase Agreement with Citigroup, Margin Calls, 2/21/08 Reservation of Rights Letter from Citigroup

Name	Last Known Address & Phone Number	Subject(s) of Information
Mangiaracina, George (UBS)	Unknown	UBS Margin Calls in February 2008
Matrullo, Elena T. (Citigroup)	Citigroup 390 Greenwich Street New York, NY 10013 (212) 723-6000	Reverse Repurchase Agreement with Citigroup, Margin Calls, 2/21/08 Reservation of Rights Letter from Citigroup
Nierenberg, Michael (Bear Sterns & Co.)	Unknown	European Hedge Fund Collapse
Novotny, Matthew (Citigroup)	Citigroup 388 Greenwich Street New York, NY 10013	Market Reaction to 2007 Form 10-K, Reverse Repurchase Agreement with Citigroup, Margin Calls, 2/21/2008 Reservation of Rights Letter from Citigroup
Onaran, Yalman (Bloomberg)	Unknown	Analyst/Investor Reaction to Thornburg's 2007 Form 10-K
Orser, Henson (Greenwich)	RBS Securities Inc. 600 Washington Blvd. Stamford, CT 06901	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K
Pluto, Jose (Goldman Sachs)	Stark Investments 3600 South Lake Drive St. Francis, WI 53235 Tel: (414) 294-7000	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K
Ramesh (UBS)	Unknown	UBS Margin Calls in February 2008
Rivera, Digna (Credit Suisse)	Credit Suisse Securities 650 California Street San Francisco, CA 94108 Tel: (415) 249-2100	Market Reaction to 2007 Form 10-K
Rose, Lou (JPMorgan)	Unknown	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K

Name	Last Known Address & Phone Number	Subject(s) of Information
Smith, Eric (Credit Suisse)	Loan Value Group LLC San Francisco, CA	Market Reaction to 2007 Form 10-K
Trivers, Tor (Natixis)	c/o Natixis 9 West 57th Street 36th Floor New York, NY 10019 Phone: (212) 891-5700 Fax: (212) 891-5777	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K
Von May, Alex (Citigroup)	Bank of America One Bryant Park New York, NY 10018	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K
Wade, Kathy (Merrill Lynch)	One Bryant Park New York, NY 10036	Margin Call Activity; Reverse Repurchase Agreements; Market Reactions to Thornburg's 2007 Form 10-K

Exhibit 3(B) to the Joint Status Report:
Defendant Jane Starrett's Initial Disclosure of Documents

Defendant Jane Starrett ("Defendant") provides the following description by category and location of documents, electronically stored information, and tangible things that are in Defendant's possession, custody or control and that Defendant may use to support her defenses, other than solely for impeachment:

Description	Location
Transcript of testimony of Jane E. Starrett before the Securities and Exchange Commission dated February 2, 2011	Milbank, Tweed, Hadley & McCloy LLP 601 South Figueroa Street, 30th Floor Los Angeles, CA 90017-5735
Documents cited in the Wells Submission of Jane E. Starrett and the Wells Submission of Larry Goldstone and Clarence Simmons dated May 12, 2011	Milbank, Tweed, Hadley & McCloy LLP 601 South Figueroa Street, 30th Floor Los Angeles, CA 90017-5735
Documents contained in the SEC's investigative file	Milbank, Tweed, Hadley & McCloy LLP 601 South Figueroa Street, 30th Floor Los Angeles, CA 90017-5735
Thornburg's SEC filings	Milbank, Tweed, Hadley & McCloy LLP 601 South Figueroa Street, 30th Floor Los Angeles, CA 90017-5735
Public documents concerning applicable accounting standards for determining other than temporary impairments and for the subsequent events accounting analysis	Milbank, Tweed, Hadley & McCloy LLP 601 South Figueroa Street, 30th Floor Los Angeles, CA 90017-5735

The above-listed documents are duplicative of those already produced to the SEC, already within the SEC's possession, custody, or control, or matters of public record.

Exhibit 3(C) to the Joint Status Report:
Defendants' Joint Disclosure of Expert Witnesses

Defendants Larry Goldstone, Clarence G. Simmons, III and Jane E. Starrett (“Defendants”) have not yet identified or retained any witnesses they intend to use at trial to present expert testimony. Without waiving the right to retain and use at trial additional experts in other relevant subject areas, Defendants currently anticipate offering expert testimony on the following subjects:

1. Accounting and auditing principles, standards, and practices relevant to the preparation and audit of Thornburg Mortgage, Inc.’s (“Thornburg”) 2007 Form 10-K and 2007 Form 10-K/A;
2. Prevailing conditions and events affecting the market for mortgage-backed securities during the financial and credit crisis of 2007-2008;
3. Financing strategies and practices in the mortgage lending industry, including the use of mortgage-backed securities and the mechanics of Reverse Repurchase Agreements used to fund some of Thornburg’s mortgage origination and investment activities;
4. Cause(s) of Thornburg’s stock price declines and investor losses following the filing of its 2007 Form 10-K and market reaction to Thornburg’s disclosures in the 10-K; and
5. Other topics as necessary to respond to expert testimony proffered by Plaintiff.